

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

<p>In the Matter of:</p> <p>Preserving the Open Internet</p> <p>Broadband Industry Practices</p>	<p>GN Docket No. 09-191</p> <p>WC Docket No. 07-52</p>
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**REPLY COMMENTS OF THE RURAL IOWA INDEPENDENT
TELEPHONE ASSOCIATION**

RIITA is a non-profit association of rural independent telephone companies, representing approximately one hundred and thirty Iowa incumbent local exchange carriers. RIITA's membership is limited to companies that serve fewer than 20,000 access lines. In reality, most members actually serve far fewer than 15,000 access lines; approximately one half of RIITA's members serve 1000 or fewer access lines. All members serve high-cost rural exchanges.

In addition, many members are also internet service providers and many provide cable and video services to their communities; some also provide IPTV. Like telephone services, the video and data services offered by RIITA members are unique. In many areas, no other providers exist and some areas served have very few customers per mile, driving up the marginal cost of service.

RIITA's members are not Internet backbone providers and have no control over the actions of the major video content providers. In general, RIITA supports the policy principles adopted by the Commission.

RIITA's primary concern is the exception for reasonable network management practices. Managing bandwidth is an important issue that faces small rural internet providers. As sellers of service, proper network management is vital to provide good service. Certain services, voice and video in particular will not be of acceptable quality unless those services can be given priority during peak periods. Without bandwidth management, voice quality can break down and video customers may not be able to adequately use their access for video.

In addition, providing bandwidth is expensive and higher bandwidth even more expensive. Companies must be allowed to charge for increasing bandwidth or they cannot continue to serve customers. Finally, some direct providers use enormous bandwidth. Companies must be allowed to manage that use, not for content, but so that all customers have access to the internet at affordable rates.

In its comments in this docket, both the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) raises the concern that nondiscrimination apply to content, application providers, internet backbone providers and transport providers. OPASTCO's concerns highlight the difficulties faces by small high-cost internet service provision: our companies have very little control over cost. In RIITA's member companies are purchasers, as well as sellers of internet and should be protected from discrimination by our providers. RIITA joins in raising those concerns.

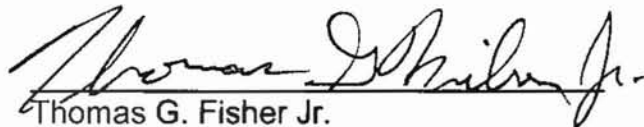
In addition, the National Telecommunications Cooperative Association (NTCA) and OPASTCO both raise concerns over the lack of clear definition given to reasonable network management practices. In order to accomplish the goal of delivering the best

possible service at the best possible prices, it is important that the Commission use flexibility in implementing its reasonable network management practices. The present rulemaking does not provide enough guidance for small rural internet providers to determine which types of network management are acceptable and which are not. As a result, RIITA asks the Commission to use caution in interpreting these rules and provide guidance as to how it will interpret those rules.

RIITA joins in the comments of NTCA and OPASTCO regarding reasonable network management.

Respectfully Submitted,

**PARRISH KRUIDENIER DUNN BOLES GRIBBLE
PARRISH GENTRY & FISHER L.L.C.**

A handwritten signature in black ink, appearing to read "Thomas G. Fisher Jr.", is written over a horizontal line.

Thomas G. Fisher Jr.
2910 Grand Avenue
Des Moines, Iowa 50312
Phone: (515) 284-5737
Fax: (515) 284-1704
tfisher@parrishlaw.com

**ATTORNEYS FOR RURAL IOWA INDEPENDENT
TELEPHONE ASSOCIATION**